

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

21-CR-7-LJV-JJM

JOHN STUART,

Defendant.

**UNOPPOSED MOTION FOR ENTRY OF A PROTECTIVE
ORDER GOVERNING SENSITIVE INVESTIGATION MATERIALS**

Pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, the United States moves for entry of a Protective Order that will ensure the confidentiality of sensitive investigation materials included within the discovery and evidence in this case.

In response to the defendant's motion to compel (Dkt. 55), the government has elected to provide additional voluntary discovery to the defendant. Some of the discovery that the government has provided or intends to provide contains information that could jeopardize ongoing investigations, including the names of child pornography websites on the dark web and details regarding information sharing between U.S. and foreign law enforcement. This information has been used to generate investigative leads that have been distributed to law enforcement around the country. Not all of these leads have been acted on by law enforcement.

Because the investigations resulting from these leads are potentially ongoing, public dissemination of sensitive law enforcement information could jeopardize investigative efforts, including by allowing targets to flee, notify confederates, or destroy evidence. As such, entry of a protective order restricting the use, dissemination, and disposition of documents containing sensitive investigation information is essential to permit the United States to provide voluntary discovery to the

defendant. The government therefore requests that the Court enter an appropriate Protective Order, a proposed version of which is attached as **Exhibit A**.

Counsel for the United States has consulted with counsel for the defendant, who has no objection to entry of the attached protective order but reserves the right to move for relief from the order in the future, if warranted.

DATED: Buffalo, New York, January 25, 2023.

TRINI E. ROSS
United States Attorney

BY: /s/ David J. Rudroff
DAVID J. RUDROFF
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
(716) 843-5806
david.rudroff@usdoj.gov